

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
v.) No. 3:22-cr-00327
[1] CHESTER GALLAGHER)
[2] HEATHER IDONI)
[3] CALVIN ZASTROW)
[4] COLEMAN BOYD)
[6] PAUL VAUGHN)
[7] DENNIS GREEN)

**MOTION FOR LEAVE TO FILE REPLY MEMORANDUM SUPPORTING
GOVERNMENT'S MOTION TO PRECLUDE IMPROPER ARGUMENTS AND
IRRELEVANT EVIDENCE**

COMES NOW, the United States of America, by and through undersigned counsel (hereinafter, the “Government”), moves the Court to grant leave to file the Reply Memorandum which accompanies this motion, in support of its motion to preclude improper arguments and irrelevant evidence. As the Reply Memorandum sets out, Defendants’ response to the Government’s motion includes a number of improper requests, as well as characterizations of the Government’s positions and statements of applicable law that require clarification.

WHEREFORE, the Government respectfully requests the Court to grant leave to file the Reply Memorandum that is attached, and to which the Court was alerted in the recent status conference on December 19, 2023.

Respectfully submitted,

HENRY C. LEVENTIS
United States Attorney
Middle District of Tennessee

s/Amanda J. Klopf
AMANDA J. KLOPF
Assistant United States Attorney
791 Church St, Suite 3300
Nashville, Tennessee 37203
Phone: 615-736-5151

KRISTEN M. CLARKE
Assistant Attorney General
Civil Rights Division

s/Kyle Boynton
KYLE BOYNTON
Trial Attorney
950 Pennsylvania Ave. NW
Washington, DC 20530
Phone: 202-598-0449
Kyle.Boynton@usdoj.gov

s/Wilfred T. Beaye, Jr.
WILFRED T. BEAYE, JR.
Trial Attorney
950 Pennsylvania Ave. NW
Washington, DC 20530
Phone: 771-333-1681
Wilfred.Beaye@usdoj.gov

CERTIFICATE OF THE SERVICE

I certify that a true and correct copy of the foregoing was filed electronically and served electronically, via the CM/ECF electronically filing system on this 26th day of December, 2023, upon the following:

JODIE A. BELL

Law Office of Jodie A. Bell
Washington Square Building 214 Second
Avenue North Suite 208
Nashville, TN 37201
USA
jodie@attorneyjodiebell.com
(615) 953-4977

Attorney for Defendant Chester Gallagher

WILLIAM J. CONWAY

William J. Conway, Esq. P.C.
214 Second Avenue North, Suite 208
Nashville, TN 37201
wjconway@gmail.com
(615) 260-5364

Attorney for Defendant Heather Idoni

LARRY LAMONT CRAIN

5214 Maryland Way
Suite 402
Brentwood, TN 37207
(615) 376-2600
larry@crainlaw.legal

STEPHEN M. CRAMPTON

Thomas More Society
P.O. Box 4506
Tupelo, MS 38803
scrampton@thomasmoresociety.org
662-255-9439

Attorneys for Defendant Paul Vaughn

G. KERRY HAYMAKER

Haymaker & Heroux, P.C.
545 Mainstream Drive
Suite 420
Nashville, TN 37228
haymaker@tennesseedefense.com
(615) 250-0050

STEVE C. THORNTON, I

Steve Thornton Attorney Law Office
P.O. Box 16465
Jackson, MS 39236
USA
mail@lawlives.com
(601) 982-0313

Attorneys for Defendant Coleman Boyd

MANUEL B. RUSS

340 21st Avenue North
Nashville, TN 37203
(615) 329-1919
russben@gmail.com

JOHN R. MANSON

3112 Carrington Court
Nashville, TN 37218
USA
jmanson@lewisthomason.com
615-259-1366

Attorneys for Defendant Dennis Green

ROBERT LYNN PARRIS
208 3rd Avenue North Ste 300
Nashville, TN 37201
rlp@robertparrisattorney.com
(901) 490-8026

DAVID I. KOMISAR
Law Office of David I. Komisar
208 Third Avenue North, Suite 300
Nashville, TN 327201
david@komisarlaw.net
615-256-3330

Attorneys for Defendant Calvin Zastrow

s/ Wilfred T. Beaye, Jr.

WILFRED T. BEAYE, JR.
Trial Attorney